

# EXHIBIT I

**Rollins, Anne E.**

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**From:** Himmel, Brian T.  
**Sent:** Thursday, April 30, 2020 2:12 PM  
**To:** Anthony Irpino; Pearl Robertson  
**Cc:** Melton, Jeffrey R.; Loy, Sarah H.  
**Subject:** MDL 2804 - ABDC privilege log  
**Attachments:** ABDC Remaining Downgrades from MDL Privilege Log 4.30.2020.xlsx

Anthony and Pearl:

As promised, we have re-examined ABDC's privilege log from MDL Track 1 in consideration of, *inter alia*, rulings issued by the Court and the Special Master regarding privilege issues. The product of that effort is the attached spreadsheet, which sets forth those entries previously contained on ABDC's MDL privilege log which are being downgraded and/or removed for one of the following reasons:

- Entries for which ABDC maintains its claim of privilege but will now produce with redactions the previously withheld document(s) [559 log entries]
- Entries for which ABDC withdraws its claim of privilege and will produce the document(s) [1477 log entries]
- Entries reflecting documents that ABDC subsequently produced (with production numbers indicated) [14 log entries]

With respect to the documents that are now being produced in full or with redactions, we expect to produce those documents in the near future. Once the redacted documents have been produced, we will be able to update the privilege log with the associated production numbers and will then provide you with a complete version of the updated MDL privilege log that reflects the above-referenced changes.

Let us know if you have any questions.

Regards,

Brian

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